

Jan Barnett  
Weekenders USA, Inc.

July 16, 2006

Federal Trade Commission/Office of the Secretary, Room H135 (Annex W)  
Re: Business Opportunity Rule, R511993  
600 Pennsylvania Avenue, NW  
Washington, D.C. 20580

RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Weekenders Coordinator. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections of the proposed rule will make it very difficult, if not impossible for me to sell Weekenders products.

One of the most confusing and burdensome sections of the proposed rule is the seven day waiting period to enroll new Coordinators. Weekenders' Sample Pak options range from \$150 - \$488. People buy TVs, cars and other items that cost much more than that and they do not have to wait seven days. I also think this seven day waiting period is unnecessary because Weekenders already has a 90% buyback policy for all products including sales kits purchased by a salesperson within the last twelve months. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Weekenders and will then have to send in many reports to Weekenders headquarters.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Weekenders is found guilty. Otherwise, Weekenders and I are put at an unfair advantage even though Weekenders has done **nothing** wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Coordinators nearest to the prospective Coordinator. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of

individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references whom may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior Coordinators, I will need to send the address of the prospective Coordinator to Weekenders headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been a Weekenders Coordinator for over nine (9) years. Originally, I became a Coordinator because I liked the products and wanted to earn some additional money, and have the freedom and flexibility to be available for my daughters. Now I am newly single after 25 years of marriage and **depend** on this income for living expenses. Also, I'd like to add that before becoming a Coordinator, I carefully checked out Weekenders, via the Better Business Bureau...there were NO complaints. I believe rather than adding Business Opportunity Rule, R511993, perhaps it would be more appropriate that the FTC recommend prospective Coordinators (consultants, or whatever is appropriate for the prospective's company) to make inquiries to the Better Business Bureau and the Direct Selling Association.

I appreciate the work of the FTC to protect consumers. However, I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available (one mentioned in previous paragraph) in achieving its goals.

Thank you for your time and consideration of my comments.

Sincerely,

Jan Barnett

xc: Glenda Duncan, Weekenders USA, Inc.